

1 Danny J. Horen, Esq.
2 NV Bar No. 13153
3 Kazerouni Law Group, APC
4 7854 W. Sahara Avenue
5 Las Vegas, NV 89117
6 Telephone: (800) 400-6808x7
Facsimile: (800) 520-5523
danny@kazlg.com

7 David H. Krieger, Esq.
8 NV Bar No. 9086
9 HAINES & KRIEGER, LLC
8985 S. Eastern Avenue, Suite 130
10 Henderson, Nevada 89123
Phone: (702) 880-5554
11 FAX: (702) 385-5518
dkrieger@hainesandkrieger.com

13 *Attorneys for Plaintiff,*
14 Saleh Elghasen

15
16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 **SALEH ELGHASEN,**
19 Plaintiff,
20 v.
21 **RBS COMPUTER, INC., d/b/a**
ROYAL MANAGEMENT
CORPORATION; and
EXPERIAN INFORMATION
SOLUTIONS, INC.,
22
23
24
Defendant.

25 **Case No.: 2:14-cv-01539-JAD-GWF**

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27
28 **DECLARATION OF DANNY J.**
HOREN IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANT RBS COMPUTER,
INC.'S MOTION TO DISMISS

I, Danny J. Horen, hereby declare under penalty of perjury that the following is true and correct:

1. I am the attorney for the Plaintiff, Saleh Elghasen, in the above-entitled
action.
2. I am licensed to practice law in the United States District Court for the
District of Nevada, and all Nevada state courts.
3. I am a member in good standing with the State Bar of Nevada.
4. I have personal knowledge of the information contained in this declaration
and could testify to such if called as a witness.
5. I submit this declaration in support of Plaintiff's Opposition to Defendant
RBS Computer, Inc.'s Motion to Dismiss.
6. Attached hereto as Exhibit A is a true and correct copy of a proof of claim
filed in Plaintiff's Bankruptcy case (10-19019-lbr) in the United States
Bankruptcy Court, District of Nevada. The proof of claim identifies
Defendant's address, 25331 1h 10 West, San Antonio Texas as the address
where notices should be sent.
7. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's August 5,
2014 Experian credit report. The report reflects both Defendant's name and
address as the entity to contact in three separate credit entries.
8. Attached hereto as Exhibit C is a true and correct copy of Experian's
September 9, 2014 credit report reinvestigation letter. The letter once again
reflects both Defendant's name and address as the entity to contact in multiple
credit entries.
9. Attached hereto as Exhibit D is a true and correct copy of Plaintiff's August
28, 2014 Experian credit report dispute letter. Plaintiff's dispute not only
includes Defendant's name and address for multiple credit entries, but it also
includes Plaintiff's address (redacted for Plaintiff's privacy), putting

1 Defendant on notice that credit reporting regarding the disputed accounts
2 would be directed toward Nevada.

- 3 10. Attached hereto as Exhibit E is a true and correct copy of Golden Loan's
4 Nevada Better Bureau Listing.
- 5 11. Attached hereto as Exhibit F is a true and correct copy of the Family Finance
6 Nevada address listing.
- 7 12. Attached hereto as Exhibit G is a true and correct copy of Gentry Finance
8 Corp. of Nevada's listing with Nevada Secretary of State. Gentry Finance
9 Corp. of Nevada is listed as a Nevada Domestic Corporation, with A P Gentry
10 serving as President and Director.
- 11 13. Attached hereto as Exhibit H is a true and correct copy of Defendant RBS
12 Computer, Inc.'s Corporationwiki profile. The profile lists A P Gentry as
13 President and Director.

14
15 I declare under penalty of perjury under the laws of the State of Nevada that
16 the foregoing is true and correct and that this declaration was signed on March 13,
17 2015 at Las Vegas, Nevada.

18
19 By: s/ Danny J. Horen

20 Danny J. Horen
21 Attorney for the Plaintiff